

1 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP  
2 Scott G. Lawson (Bar No. 174671)  
3 scottlawson@quinnemanuel.com  
4 Patrick Doolittle (Bar No. 203659)  
5 patrickdoolittle@quinnemanuel.com  
6 Andrea Pallios Roberts (Bar No. 228128)  
7 andreaproberts@quinnemanuel.com  
8 50 California Street, 22nd Floor  
9 San Francisco, California 94111  
10 Telephone: (415) 875-6600  
11 Facsimile: (415) 875-6700

\*\*E-filed 1/15/08\*\*

7 Attorneys for Defendant  
8 International Business Machines Corporation

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(SAN JOSE DIVISION)

12 MARY HELEN WOODSON,  
13 Plaintiff,  
14 vs.  
15 INTERNATIONAL BUSINESS MACHINES  
16 CORPORATION and DOES ONE through  
TWENTY, Inclusive,  
17 Defendant.

CASE NO. C 05-03387 JF (PVT)

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE TO  
FILE RESPONSE TO THIRD AMENDED  
COMPLAINT AFTER CONSOLIDATION  
AND CONTINUING CASE  
MANAGEMENT CONFERENCE**

19 WHEREAS, on December 20, 2007, the parties entered into a stipulation extending  
20 Plaintiff's deadline to file her Third Amended Complaint After Consolidation until December 27,  
21 2007, and making IBM's response thereto due on January 11, 2008;

22 WHEREAS, there is currently a Case Management Conference scheduled for February 15,  
23 2008 before this Court;

24 WHEREAS, the parties are currently in negotiations regarding settlement of the matter,  
25 require additional time for those negotiations, and wish to postpone a response to Plaintiff's Third  
26 Amended Complaint After Consolidation, any necessary hearing thereon, and the Case  
27 Management Conference, to provide the parties additional time to negotiate;

WHEREAS, the parties have agreed to extend the deadline for IBM to respond to Plaintiff's Third Amended Complaint After Consolidation until February 1, 2008;

WHEREAS, the parties agree that any hearing on IBM's response to Plaintiff's Third Amended Complaint After Consolidation, if necessary, shall be scheduled no earlier than March 21, 2008;

WHEREAS, the parties agree to continue the case management conference until March 21, 2008 at 10:30 a.m.; and

WHEREAS, the parties have not previously sought an extension of IBM's deadline to respond to Plaintiff's Third Amended Complaint After Consolidation.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, that  
11 IBM's response to Plaintiff's Third Amended Complaint After Consolidation shall be due on  
12 February 1, 2008, the Case Management Conference currently scheduled for February 15, 2008  
13 shall be continued until March 21, 2008 at 10:30 a.m., and any hearing on IBM's response to  
14 Plaintiff's Third Amended Complaint After Consolidation, if necessary, shall be scheduled no  
15 earlier than March 21, 2008.

17 Dated: January 11, 2008 MARY HELEN WOODSON

19 By /s/ Mary Helen Woodson  
Mary Helen Woodson

21 Dated: January 11, 2008 QUINN EMANUEL URQUHART OLIVER &  
22 HEDGES, LLP

By /s/ Scott G. Lawson  
Scott G. Lawson  
Attorneys for Defendant  
International Business Machines Corporation

## Order

Pursuant to the foregoing stipulation between the parties, IT IS SO ORDERED.

Dated: 1/15/08

Jeremy Fogel  
United States District Judge

50951/2314336.150951/23  
10495.1

## **Signature Attestation**

2 I hereby attest that Plaintiff Mary Helen Woodson read and agreed to the above  
3 **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE**  
4 **RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** and gave  
5 Quinn Emanuel permission to sign and file the stipulation on her behalf.

6 | Dated: January 11, 2008

QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

By /s/ Scott G. Lawson  
Scott G. Lawson  
Attorneys for Defendant  
International Business Machines Corporation

## **CERTIFICATE OF SERVICE**

I am employed in the County of San Mateo, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065-2139.

On January 11, 2008, I served true copies of the following document(s) described as **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** on the parties in this action as follows:

**BY MAIL:** On January 11, 2008, I enclosed the foregoing into sealed envelope(s) addressed as shown above, and I deposited such envelope(s) in the mail at Redwood Shores, California. The envelope was mailed with postage thereon fully prepaid.

**BY ELECTRONIC MAIL TRANSMISSION:** By electronic mail transmission from andreasroberts@quinnemanuel.com on **January 11, 2008**, by transmitting a PDF format copy of such document(s) to each such person at the e-mail address listed below their address(es). The document(s) was/were transmitted by electronic transmission and such transmission was reported as complete and without error.

Mary Helen Woodson  
475 Milan Drive, #102  
San Jose, CA 95134  
Telephone: 408-944-9152  
Cell Phone: 408-206-4087  
helenwoodson@gmail.com

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **January 11, 2008**, at Redwood Shores, California.

/s/ Andrea Pallios Roberts  
Andrea Pallios Roberts